

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

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UNITED STATES OF AMERICA      )  
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V.                                ) CR. NO.1:13-CR-00142-PB  
                                    )  
JOHNATHON IRISH                )  
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**DEFENDANT'S RESPONSE TO THE GOVERNMENT'S MOTION FOR A  
PROTECTIVE ORDER REGARDING DISCOVERY**

The government has filed a Motion For A Protective Order Regarding Discovery.

*Document 18*, together with a proposed Protective Order Regarding Discovery, *Document 18-1*. Counsel has discussed this matter with the defendant. The defendant objects only to paragraph 7 of the proposed order. AUSA Nick Abramson has agreed to amend paragraph 7 of the order to address the defendant's concerns. Grounds follow:

As expressed in the government's motion, the issue is a concern over seven specific pieces of evidence, DVDs number 20, 22, 29, 38, 42a, and 42c, which are described as the "Protective DVD's". The defendant takes no position on the validity of the concerns expressed by the government regarding these DVDs, however, he assents to the government's request for a protective order regarding these items.

The relief requested in paragraph 7 of the protective order goes well beyond these seven items by requesting that "[a]t the conclusion of this case, the defendant and his counsel shall return to the United States all discovery provided by the United States or

certify that any such discovery has been destroyed.” The defendant requests that the return or destruction of discovery be limited to the seven “protected DVDs”. With that change the defendant assents to the government’s motion for a protective order.

AUSA Nick Abramson has assented to this change.

No memorandum of law is necessary to the resolution of the issues raised herein.

WHEREFORE the defendant requests that this Court issue the protective order as amended above.

Respectfully submitted,  
Johnathon Irish  
By His Attorney,

Date: December 31, 2013

/s/ Jonathan R. Saxe  
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**CERTIFICATE OF SERVICE**

I hereby certify that the above document was served on the following person on December 31, 2013 in the manner specified herein: electronically served through ECF to AUSA Nick Abramson.

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